CONSENT TO EXTEND THE TIME TO ASSESS CIVIL PENALTIES PROVIDED BY 31 U.S.C. § 5321 FOR FBAR VIOLATIONS

WHEREAS, the parties to this agreement desire to extend the time during which the penalties provided by 31 U.S.C. 5321 may be assessed and collected,

Alexandru Bit	ttner	
	(name and taxpaver identification number)	
United States persor		
Office States persor	(address)	
nd the Commission	er of the Internal Revenue Service, hereby agree and	consent to the following:
(1) For violati	ons with respect to the requirement, established under	31 U.S.C. 5314, for a
United States persor	to report having a financial interest in or signature aut	hority, or other authority,
OVER A TINANCIAL ACCO	unt during the calendar years ending December 31, 2007	maintained with a
	cated in a foreign country, the amount of any penalty p	
	ed at any time on or before December 31, 2016.	
	ent does not reduce waive or extend any period of lim	itation under 26 II S.C.
(2) This conse	ent does not reduce, waive, or extend any period of lim r collecting tax. This consent also does not supersede	
(2) This conse	ent does not reduce, waive, or extend any period of lim r collecting tax. This consent also does not supersede the United States person and the Internal Revenue Ser	or amend any other
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